REMARKS

Claims 1-3, 7, 10-15, 17, 19-22 and 25-72 are pending in this application. No new amendments are presented. Claims 1-3, 7, 10-15, 17, 19-22 and 25-72 have been rejected under 35 U.S.C. § 103(a) as being obvious over Sezan et al. U.S. Patent 5,956,458 (hereinafter "Sezan") in view of Murata et al U.S. Patent 6,118,925 (hereinafter "Murata"), Yamagami U.S. Patent 6,334,025 (hereinafter "Yamagami") and Lemaire et al U.S. Patent 5,444,768 (hereinafter "Lemaire").

Yamagami discloses displaying a directory of image, audio and text files, wherein the files are represented by icons. In applicants' amendment dated October 28, 2003, applicants noted that Yamagami does not disclose showing titles of the files with the icons, but rather, a "text icon" is displayed in the case of a text file to indicate that the nature of that file is text (as opposed to, for example, an image). However, no text of a title is displayed with the text icon. In the Office Action dated January 14, 2004, while the Examiner questions the wisdom of designing a system as disclosed in Yamagami, he admits that, "Yamagami is silent as to whether the icon is simply a graphic without information regarding the contents of the text or the icon displays the actual text . . . " (page 2, lines 8-10). Applicants suggest that perhaps the reason Yamagami does not disclose displaying text titles in the directory screen is because most digital

still cameras have relatively small (one to two inch diagonal) displays that would make reading text titles of the multiple icons shown in FIG. 5 of Yamagami difficult. The Examiner, however, goes on to contend that, "Yamagami discloses that the directory includes textual titles derived from the stored textual titles (col. 12, lines 35-37)." The cited section of Yamagami, though, does not support the Examiner's assertion. The cited section states, "The text is displayed as shown in FIG. 6. This display can be presented independently or in a form superimposed upon the display of screen of FIG. 5 or 7." However, as made clear by the preceding sentence (col. 12, lines 31-34), the text display of FIG. 6 is displayed in response to selection and activation of one of the icons from the directory display of FIG. 5. Thus, Yamagami discloses a directory with icons and no title text, or a directory with icons and no title text with a window blocking out parts of the directory to show the text title associated with a single icon after a user selects and activates an icon from the FIG. 5 directory. Thus, Yamagami does not disclose (taking claim 1 as an example), a "directory [that] includes textual tiles associated with the displayed video programs . . . "

Applicants also argued in their October 28, 2003 amendment that Yamagami does not disclose recording moving images and thus there is no motivation to combine Yamagami with full motion video recording art such as, for example,

Henmi. In response, the Examiner stated that Yamagami discloses "the CPU 13 for signal processing halts the display of moving picture . . . which has been retained in the buffer memory." (col. 9, lines 50-53). The Examiner continues, "[a]lthough Yamagami does not store moving images permanently, Yamagami is at least capable of storing moving image (even if temporarily)." This conclusion is erroneous and is respectfully traversed. Yamagami generally discloses a digital still camera, which, as commonly known in digital still cameras, contains a display screen that displays the image then being received by the charge-coupled device at that moment. As is common in display art, in order to display an image, data representative of that image is temporarily written in a display buffer. When it is desired to change the image on the display, new data is written to the display buffer, overwriting the data of the previous image. Applicants see nothing in the cited section of Yamagami (or elsewhere in Yamagami), that suggests that the image display buffer memory 12 of Yamagami operates any differently than conventional display buffer memories, and specifically, that the buffer would simultaneously store more than one image at a time, even when displaying what appears to a moving image on the display when the camera lens is moved.

Even if the Examiner is correct that Yamagami discloses storing more than one image (perhaps two) in the

image display buffer memory 12, which he is not, this does not make Yamagami combinable with the prior art of the type used in the previous Office Action as asserted by the Examiner on page 3 of the present Office Action. As stated in applicants' amendment dated October 28, 2004, "The present invention records a full motion video program which itself includes an audio track, and then further records a second, separate audio track to be associated with that video segment. Recording separate still-image and audio files does not describe, teach or suggest associating independent audio files with a recording that features integrated audio and video." The transitory storing of perhaps at most two images in an image display buffer memory (not disclosed in Yamagami) still does not address the fundamental differences between still image recording and full motion video recording cited by applicants and would provide no motivation to combine Yamagami with the full motion video references. Specifically, the Examiner has not shown any motivation to combine aspects of the still image digital disclosed in Yamagami with the professional television broadcasting video cuing, cutting and sequencing system disclosed in the newly cited Murata.

As the Examiner has not adequately addressed applicants' arguments contained in the October 28, 2003 amendment and those arguments are still completely applicable, applicants incorporate herein the specific application of the

art to the claims contained in that amendment and do not needlessly repeat it here.

For the foregoing reasons, it is respectfully submitted that the case is in condition for allowance. Reconsideration and allowance are respectfully requested.

Respectfully submitted,

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